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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matters of)
)
Ameritech Corporation Telephone Operating)
Companies' Continuing Property Records Audit)
)
Bell Atlantic (North) Telephone Companies')
Continuing Property Records Audit)
)
Bell Atlantic (South) Telephone Companies')
Continuing Property Records Audit)
)
BellSouth Telecommunications' Continuing)
Property Records Audit)
)
Pacific Bell and Nevada Bell Telephone)
Companies' Continuing Property Records Audit)
)
Southwestern Bell Telephone Company's)
Continuing Property Records Audit)
)
U S West Telephone Companies' Continuing)
Property Records Audit)
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JUN 24 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 99-117

ASD File No. 99-22

MCI WORLDCOM MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, MCI WorldCom, Inc. (MCI WorldCom) respectfully requests that the Commission extend the time to file comments and replies on the Notice of Inquiry (Notice) in the above-captioned proceeding. MCI WorldCom requests that the Commission extend the time to file comments to September 13, 1999 and extend the time to file reply comments to October 13, 1999.

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List

On June 22, 1999, MCI WorldCom filed a Freedom of Information Act (FOIA) request, asking the Commission to release to the public certain materials associated with Common Carrier Bureau audits of the Regional Bell Operating Companies' (RBOCs') continuing property records. Specifically, MCI WorldCom requested that the Commission release to the public any materials that the RBOCs have submitted to the Accounting Safeguards Division to explain why hard-wired COE equipment items were not found by the auditors or to support claims that items in the audit sample should be "rescored." MCI WorldCom also requested that the Commission disclose any audit workpapers generated by ASD staff during the course of the audits that show or support the item-by-item scoring of the items in the audit sample.

MCI WorldCom requests that the Commission extend the dates for comments and replies in order to allow time for the custodian of the records to act on MCI WorldCom's FOIA request and for MCI WorldCom and other interested parties to analyze the requested materials. The materials requested by MCI WorldCom are necessary for interested parties to respond to the Notice's Issue No. 2: "[t]he validity and reasonableness of the methodology used by the Bureau's auditors in determining whether to rescore or to modify a finding during a field audit that equipment was 'not found'."¹ While the Bureau has released to the public a general overview of the methodology used to rescore a finding that equipment was "not found,"² the RBOCs have claimed that Bureau auditors either disregarded the RBOC supplemental

¹Notice at ¶ 6.

²Public Notice, April 7, 1999, DA 99-668.

submissions entirely or applied the “rescoring” standards inconsistently and unreasonably. In order to address the issue of whether the rescoring methodology used by the Bureau auditors was valid and reasonable, interested parties must be able to examine, on an item-by-item basis, the auditors’ scoring decisions and the material the RBOCs submitted in support of their requests to “rescore” an item. Extending the time to file comments will allow interested parties to examine this material, once it has been disclosed by the Commission, and thereby provide complete comments on the Notice’s Issue No. 2.

Because the auditors’ scoring of items as “found,” “not found,” or “not verifiable” is the starting point for the auditors’ statistical analysis, conclusions, and recommended remedial actions, the audit material is relevant not only to the Notice’s Issue No. 2, but also to most of the other issues raised by the Notice. These include Issue No. 4 -- the accounting adjustments that should be made to account for “missing” plant, Issue No. 7 -- the auditors’ recommendation that the RBOCs engage independent auditors to review their practices, procedures and controls, and Issue No. 10 -- the reasonableness of the auditors’ interpretation of the CPR requirements.

Extension of the time to file comments to September 13, 1999 will allow sufficient time for the custodian of the records requested by MCI WorldCom to act on MCI WorldCom’s FOIA request,³ and for interested parties to analyze the requested

³Intervals for processing FOIA requests are spelled out in Section 0.461(g)-(i) of the Commission’s rules. Pursuant to Section 0.461(g), once the custodian of the records receives the request from the FOIA Control Office, the custodian of the records has 20 working days to act on the request. The custodian of the records may extend the time for action by up to 10 working days. Section 0.461(h). Once a request is granted, the records

materials once they are disclosed. If the Commission is able to act on MCI WorldCom's FOIA request in less than the 20 working days permitted by the Commission's rules, the Commission could adjust the date for filing comments accordingly. At a minimum, the Commission should allow 30 days from the date on which the requested materials are disclosed and the date for filing comments.

MCI WorldCom's request for additional time will allow it and other parties to provide the Commission with complete comments on Issue No. 2 and other key issues raised by the Notice. While the RBOCs have most of the details of the audit procedures in their possession, this proceeding provides the first opportunity for the RBOCs' customers, state regulators, and other interested parties to comment on the audit reports. The requested extension of time will allow these parties to prepare a complete analysis of Issue No. 2 and other issues raised by the Notice, and thereby assist the Commission in evaluating the Bureau's audit methodology and determining an appropriate course of action. No party would be prejudiced by this extension of time

Respectfully submitted,
MCI WORLDCOM, INC.



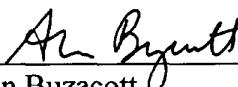
Alan Buzacott
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June 24, 1999

shall be produced for inspection if an application for review is not filed within 10 working days after the date of the written ruling. Section 0.461(i).

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on June 24, 1999.



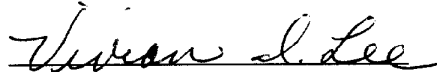
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CERTIFICATE OF SERVICE

I, Vivian I. Lee, do hereby certify that copies of the foregoing Motion for Extension of Time were sent via first class mail, postage paid, to the following on this 24th day of June, 1999.

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**HAND DELIVERED


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